

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re DMCA Section 512(h) Subpoena to Discord,  
Inc.

**Case No. 3:23-MC-00062-S**

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Nexon Korea Corporation (“Nexon”) and Discord, Inc. (“Discord”) respectfully file this Joint Motion for Entry of Protective Order and attach a proposed Protective Order hereto as Exhibit A.

On or about October 3, 2023, pursuant to 17 U.S.C. §512(h), Nexon served a subpoena upon Discord requesting that Discord provide information sufficient for Nexon to identify users who may have violated Nexon’s intellectual property rights (the “Subpoena”). Discord timely objected to the subpoena on a number of grounds, and when the parties’ multiple efforts to resolve the dispute were not successful, Nexon filed a motion to compel. Nexon and Discord have been diligently meeting and conferring in an attempt to resolve their dispute to eliminate the need for further court action.

Accordingly, through the meet and confer process, Nexon and Discord have agreed that responsive documents and information will contain confidential, proprietary, and business information and/or trade secrets, including and without limitation, protected personal information of Discord users. Thus, in the interest of privacy, and in order to ensure proper restricted use of the disclosed information, Discord and Nexon seek protection of the disclosed documents and

information. Accordingly, Nexon and Discord, without waiving any claims or defenses that either party may have on the merits of the Subpoena or motion to compel, stipulate to the entry of the attached Protective Order, and respectfully request that the Court enter the proposed Protective Order to facilitate satisfaction of the Subpoena.

Respectfully submitted,

/s/ Jennifer H. Doan

Jennifer H. Doan  
Texas Bar No. 08809050  
HALTOM & DOAN  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: jdoan@haltomdoan.com

Donald R. Ross  
Texas Bar No. 17286000  
HALTOM & DOAN  
4417 Oak Knoll Drive  
Plano, Texas 75093  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: dross@haltomdoan.com

**ATTORNEYS FOR DISCORD, INC.**

/s/ Dominique Williams (w/permission)

Sul Lee  
State Bar No. 24078844  
sul@sulleelaw.com  
Diren W. Singhe  
State Bar No. 24044135  
dsinghe@sulleelaw.com  
Dominique Williams  
State Bar No. 24125458  
dwilliams@sulleelaw.com  
SUL LEE LAW FIRM, PLLC  
3030 LBJ Fwy, Suite 220  
Tel. (214) 206-4064  
Fax. (214) 206-4064

**ATTORNEYS FOR NEXON KOREA  
CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on this the 28th day of February 2024.

/s/ Jennifer H. Doan  
Jennifer H. Doan

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a), the parties met and conferred regarding the requested relief. This motion is filed jointly and is unopposed.

/s/ Jennifer H. Doan  
Jennifer H. Doan